

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

LIANG YANG, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

TRUST FOR ADVISED PORTFOLIOS,
INFINITY Q CAPITAL MANAGEMENT LLC,
CHRISTOPHER E. KASHMERICK, JOHN C.
CRYSTAL, ALBERT J. DIULIO, S.J., HARRY
E. RESIS, RUSSELL B. SIMON, LEONARD
POTTER, and JAMES VELISSARIS,

Defendants.

No. 1:21-cv-01047-FB-RLM

**DECLARATION OF MATTHEW M. GUINEY
IN SUPPORT OF THE MOTION OF THE PALM BEACH INVESTOR GROUP FOR
(1) CONSOLIDATION OF THE RELATED ACTIONS;
(2) APPOINTMENT AS LEAD PLAINTIFF; AND
(3) APPROVAL OF SELECTION OF COUNSEL**

I, Matthew M. Guiney, hereby declare:

1. I am a partner at the law firm of Wolf Haldenstein Adler Freeman & Herz LLP

("Wolf Haldenstein"). I submit this declaration in support of the motion of the Palm Beach Investor Group ("Movants") for consolidation of the related actions, appointment as Lead Plaintiff, and approval of Movants' selection of Wolf Haldenstein as Lead Counsel.

2. Attached hereto as Exhibit 1 is a true and correct copy of the notice of pendency published on *Business Wire* on February 25, 2021.

3. Attached hereto as Exhibit 2 is a true and correct copy of Movants' sworn certifications, demonstrating standing as class members, as well as requisite financial interest in the outcome of the litigation.

4. Attached hereto as Exhibit 3 is a true and correct copy of a loss chart detailing Movants' transactions in IQDNX. and demonstrating Movants' losses therefrom.

5. Attached hereto as Exhibit 4 is a true and correct copy of my firm's resume, setting forth Wolf Haldenstein's background and considerable experience litigating complex securities class actions in federal and state courts throughout the country.

Signed under penalty of perjury this 27th day of April 2021.

s/ Matthew M. Guiney
Matthew M. Guiney